

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

IN RE:	)	CHAPTER 11
	)	
7220, LLC,	)	CASE NO: 15-20448-JRS
	)	
Debtor.	)	
	)	

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**MOTION FOR USE OF CASH COLLATERAL**

COMES NOW 7220, LLC, Debtor and Debtor-in-possession in the above referenced Chapter 11 case, and files this Motion For Use of Cash Collateral, respectfully showing the Court as follows:

1. Debtor filed a petition constituting an Order for Relief under 11 U.S.C. Chapter 11 on March 2, 2015.
2. Debtor owns a commercial building located at 3890 Johns Creek Parkway, Suwanee, Forsyth County, Georgia (the "Property"). The rents from the commercial building are the sole source of revenue for the Debtor.
3. Northside-Rosser Debt Holdings, LLC ("Northside-Rosser") asserts a first priority lien on the Property and the rents therefrom to secure a claim in the disputed amount of \$10,549,229.09. The Property has a market value of at least \$11,000,000.00.
4. The rents from the Property may constitute cash collateral as that term is defined in 11 U.S.C. Section 363 (the "Cash Collateral"). Debtor believes that Northside-Rosser asserts an interest in the Cash Collateral. Debtor is unaware of any other party asserting an interest in the Cash Collateral.
5. Debtor needs to use the Cash Collateral to meet its ordinary operating expenses. Debtor has no other source of income other than the Cash Collateral. Attached hereto as Exhibit

"A" is a copy of Debtor's budget of projected expenses for the six months from March 2015 through and including August 2015.

6. To the extent that Debtor uses the Cash Collateral, Debtor proposes to grant Northside-Rosser replacement liens in rents generated post-petition of the same kind, extent and priority as those existing pre-petition. Hence, Northside-Rosser's interests in the Debtor's Cash Collateral are adequately protected.

**WHEREFORE**, Debtor prays that this Court grant Debtor the authority to use Cash Collateral pursuant to the attached budget, and for such other relief as is just and proper.

On this 3<sup>rd</sup> day of March, 2015.

MACEY, WILENSKY & HENNINGS, LLC

BY: /s/ David W. Gordon

David W. Gordon; SBN: 726483

William A. Rountree; SBN: 616503

*Attorneys for Debtor*

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**EXHIBIT "A"**

**(BUDGET FOR MARCH 2015 – AUGUST 2015)**

04023204-

Johns Creek  
Income and Expense Detail  
March - April 2015 budget

		Mar	April	May	June	July	August	Budget
<b>REVENUE</b>								
4500-0000	RENT	80,660	80,660	82,273	82,273	82,273	82,273	490,413
4500-0006	RENT CONCESSION	-	-	-	-	-	-	-
4500-0010	REAL ESTATE TAX	-	-	-	-	-	-	-
4500-0020	OPERATING EXPENSE RECOVERY	33,332	33,332	33,332	33,332	33,332	33,332	199,989
4500-0030	PARKING GARAGE REVENUE	-	-	-	-	-	-	-
4500-0031	STORAGE INCOME	-	-	-	-	-	-	-
4500-0032	ANTENNA INCOME	-	-	-	-	-	-	-
4500-0040	TENANT SERVICES INCOME	137	137	137	137	137	137	822
4650-0000	UTILITY REIMB	-	-	-	-	-	-	-
	<b>TOTAL REVENUE</b>	<b>114,128</b>	<b>114,128</b>	<b>115,742</b>	<b>115,742</b>	<b>115,742</b>	<b>115,742</b>	<b>691,224</b>
<b>OPERATING EXPENSES</b>								
<b>Janitorial</b>								
6300-0001	JANITORIAL CONTRACT	2,872	2,872	2,872	2,872	2,872	2,872	17,232
6300-0002	JANITORIAL WINDOW CLG	-	-	-	-	-	-	-
6300-0003	JANITORIAL SUPPLY & MAINT	495	495	469	469	469	496	2,894
6300-0004	JANITORIAL CARPET CLEANING	-	-	-	-	-	-	-
6300-0005	JANITORIAL DUMPSTERS	280	280	280	280	280	280	1,680
	<b>Total Janitorial</b>	<b>3,647</b>	<b>3,647</b>	<b>3,621</b>	<b>3,621</b>	<b>3,621</b>	<b>3,648</b>	<b>21,806</b>
<b>Landscaping</b>								
6300-0010	LANDSCAPING EXTERIOR	740	1,200	2,094	740	740	740	6,254
6300-0011	LANDSCAPING INTERIOR	52	52	52	52	52	52	312
6300-0012	LANDSCAPING IRRIGATION	-	-	500	-	-	-	500
6300-0014	LANDSCAPING MISC	750	-	-	-	-	-	750
	<b>Total Landscaping</b>	<b>1,542</b>	<b>1,252</b>	<b>2,646</b>	<b>792</b>	<b>792</b>	<b>792</b>	<b>7,816</b>
<b>Electrical</b>								
6300-0021	ELECTRICAL SUPPLIES	-	-	-	500	-	-	500
6300-0022	ELECTRICAL R & M	-	-	600	250	-	-	850
	<b>Total Electrical</b>	<b>-</b>	<b>-</b>	<b>600</b>	<b>750</b>	<b>-</b>	<b>-</b>	<b>1,350</b>
<b>Security</b>								
6300-0025	SECURITY CONTRACT	70	175	70	70	175	70	630
6300-0026	SECURITY SUPPLIES	-	-	-	-	-	-	-
	<b>Total Security</b>	<b>70</b>	<b>175</b>	<b>70</b>	<b>70</b>	<b>175</b>	<b>70</b>	<b>630</b>
<b>HVAC</b>								
6300-0030	HVAC CONTRACT	-	-	1,050	-	-	1,050	2,100
6300-0031	HVAC WATER TREATMENT	-	-	-	-	-	-	-
6300-0032	HVAC SUPPLIES	-	-	-	-	-	-	-
6300-0033	HVAC REPAIR & MAINT.	70	1,570	70	70	70	820	2,670
6300-0034	HVAC PAYROLL	-	-	-	-	-	-	-
	<b>Total HVAC</b>	<b>70</b>	<b>1,570</b>	<b>1,120</b>	<b>70</b>	<b>70</b>	<b>1,870</b>	<b>4,770</b>
<b>Elevators</b>								
6300-0040	ELEVATOR CONTRACT	230	230	230	230	230	230	1,380
6300-0041	ELEVATOR PHONES	70	70	70	70	70	70	420
6300-0042	ELEVATOR R & M	-	-	-	-	-	-	-
6300-0043	ELEVATOR SIGNS	-	-	-	-	-	-	-
	<b>Total Elevators</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>1,800</b>
<b>Repair &amp; Maintenance</b>								
6300-0050	PLUMBING R&M	-	-	750	-	250	-	1,000
6300-0051	R & M PAINTING	-	-	-	-	-	-	-
6300-0052	SEASONAL DÉCOR	-	-	-	-	-	-	-
6300-0053	R & M FIRE ALARM	640	740	1,296	140	490	390	3,696
6300-0055	R & M LABOR	1,364	1,364	1,364	1,364	2,046	1,364	8,866

6300-0056	R & M SUPPLIES	250	-	-	-	-	-	250
6300-0057	R & M WINDOW CLEANING	-	-	-	880	-	-	880
6300-0058	R & M LOCKS KEYS & DOORS	-	250	-	-	-	-	250
6300-0059	R & M PEST CONTROL	70	70	70	70	70	70	420
6300-0060	R & M MISC	-	-	-	-	-	-	-
6300-0061	R & M ROOF	-	-	-	-	-	-	-
6300-0062	R & M PARKING LOT & DECK	-	-	-	-	-	-	-
6300-0063	R & M WOOD/METAL MAINT	267	267	267	267	267	267	1,602
6300-0064	R & M PRESSURE WASHING	-	-	-	-	-	-	-
6300-0065	R & M SIGNAGE	-	-	-	-	-	-	-
6300-0066	R & M EQUIPMENT RENTAL	-	-	-	-	-	-	-
6300-0067	R & M SMALL TOOLS	-	-	-	-	-	-	-
6300-0068	R & M UNIFORMS	-	-	-	-	-	-	-
6300-0070	R & M MILEAGE	70	70	70	70	70	70	420
	Total R & M	2,661	2,761	3,817	2,791	3,193	2,161	17,384

**Utilities**

6300-0200	UTILITIES WATER/SEWER	300	300	800	1,800	1,800	1,800	6,800
6300-0201	UTILITIES ELECTRICITY	10,500	10,500	10,500	10,500	10,500	10,500	63,000
6300-0202	UTILITIES GAS	-	-	-	-	-	-	-
	Total Utilities	10,800	10,800	11,300	12,300	12,300	12,300	69,800

**General & Admin**

6300-0220	PROPERTY MGMT FEES	3,000	3,000	3,000	3,000	3,000	3,000	18,000
6300-0221	ADMIN OFFICE & SUPPLIES	60	60	60	60	60	60	360
6300-0222	ADMIN PAYROLL	1,775	1,775	1,775	1,775	2,663	1,775	11,538
6300-0223	ADMIN POSTAGE	40	40	40	40	40	40	240
6300-0224	ADMIN TELEPHONES	105	105	105	105	105	105	630
6300-0225	ADMIN PRINTING & COPYING	25	-	-	-	-	-	25
6300-0295	Association Dues	225	225	225	225	225	225	1,350
6300-0227	ADMIN TENANT RELATIONS	-	-	-	-	-	-	-
6300-0300	ADMIN PROPERTY TAXES	250	-	-	-	-	-	250
6300-0301	ADMIN OTHER TAXES	-	-	-	-	-	-	-
6300-0305	ADMIN PROP INSURANCE	-	-	3,623	-	-	-	3,623
	Total Admin	5,480	5,205	8,828	5,205	6,093	5,205	36,016
	TOTAL EXPENSES	24,570	25,710	32,302	25,899	26,544	26,346	161,371

**Non-Operating Expense**

6300-0513	NON-OPEX ADMIN	119	119	119	119	119	119	714
6300-0458	NON-OPEX R&M	-	-	-	-	-	-	-
6300-0452	NON-OPEX TENANT RELATIONS	100	-	-	100	-	-	200
6300-0500	NON-OPEX ADVERTISING	60	60	60	60	60	60	360
6300-0501	NON-OPEX LEGAL/ACCTG	2,160	1,910	1,910	1,910	1,910	2,160	11,960
6300-0502	NON-OPEX BANK FEES	50	50	50	50	50	50	300
6300-0503	NON-OPEX SPACE PLANNING	-	-	-	-	-	-	-
6300-0504	NON-OPEX PROFESSIONAL FEES	-	-	175	-	-	-	175
6300-0519	NON-OPEX Asset Mgmt Fee	425	425	425	425	425	425	2,550
6300-0506	NON-OPEX TENANT IMPROVEMENTS	-	-	-	-	-	-	-
6300-0507	NON-OPEX BLDG IMPROVEMENTS	-	-	-	-	-	-	-
	Total Non Operating Expense	2,914	2,564	2,739	2,664	2,564	2,814	16,259

**DEBT SERVICE**

Principal & interest	39,830	44,098	42,675	44,098	42,675	44,098	257,473
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**NET INCOME**

<b>46,814</b>	<b>41,757</b>	<b>38,026</b>	<b>43,081</b>	<b>43,958</b>	<b>42,484</b>	<b>256,121</b>
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7220, LLC,	)	CASE NO: 15-20448-JRS
	)	
Debtor.	)	
_____	)	

**CERTIFICATE OF SERVICE**

I certify that a copy of **Motion for Use of Cash Collateral** was served by depositing a copy of same in the United States Mail, first class postage prepaid, addressed to:

Office of United States Trustee  
362 United States Courthouse  
75 Spring Street, S.W.  
Atlanta, Georgia 30303

Matthew Brower  
Northside-Rosser Debt Holdings, LLC  
152 West 57<sup>th</sup> Street  
19<sup>th</sup> Floor  
New York, New York 10019

AND

The Twenty Largest Unsecured Creditors as shown on Exhibit "A" attached hereto.

This 3<sup>rd</sup> day of March, 2015.

MACEY, WILENSKY & HENNINGS, LLC

BY: /s/ David W. Gordon  
David W. Gordon; SBN: 726483  
William A. Rountree; SBN: 616503  
*Attorneys for Debtor*

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Atlanta, GA 30308  
(404) 584-1200; (404) 681-4355 – Facsimile  
dgordon@maceywilensky.com

**EXHIBIT "A"**

**7220, LLC**

**LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS**

Gail Pollock  
8143 Valhalla Drive  
Delray Beach, FL 33443

Highgrove Partners, LLC  
c/o James McCutcheon  
7730 The Bluffs  
Austell, GA 30168

Jackson Corporate Real Estate  
101 Marietta Street  
31<sup>st</sup> Floor  
Atlanta, GA 30303

Sure Tech Services, Inc.  
P. O. Box 884  
Jefferson, GA 30549